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January 5, 2001

Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

CC Docket No. 94-102

RECEIVED

SEP - 7 2004

Re: Texas RSA 8 South Limited Partnership
E-911 Phase 2 Implementation Plan

Federal Communications Commission
Office of the Secretary

Dear Ms. Salas:

On behalf of Texas RSA 8 South Limited Partnership d/b/a WESTEX Telecommunications ("WESTEX") and pursuant to Section 20.18(i) of the Commission's Rules, enclosed is a narrative statement regarding WESTEX's E-911 Phase 2 implementation plans.

If you have any questions regarding this filing, please contact the undersigned.

Very truly yours,

B Lynn F Ratnavale

B. Lynn F. Ratnavale

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(2) Testing and Verification

Texas RSA 8 has not conducted any tests of Phase II technology. Texas RSA 8 will adopt testing and verification methods and procedures based on sound engineering and statistical practices. This testing and verification will likely be incorporated into routine testing of the wireless network by company technicians.

(3) Implementation Details and Schedule

Texas RSA 8's strategy will be to purchase the required equipment (hardware and software) and services on the competitive market and deploy the same in accordance with the Commission's rules. Texas RSA 8 will notify the FCC of a specific schedule for implementation once a vendor has been chosen. Texas RSA 8 recognizes that the Commission's rules require the deployment of a Phase II system, even if none exists which fully meet the Commission's accuracy requirements.

(4) PSAP Interface

Texas RSA 8 will incorporate any required industry standards. Texas RSA 8 will transmit the data through the public switched telephone network to the PSAP following industry standards adopted by the service supplier providing E911 service to the PSAP.

(5) Existing Handsets

Not Applicable

(6) Location of Non-Compatible Handsets

Not Applicable

(7) Other Information

Texas RSA 8 has not received a valid request for Phase II E911 service

Background/Contact Information

(1) Carrier Identifying Information

Name: Texas RSA 8 South Limited Partnership
d.b.a. WESTEX Telecommunications, Inc.
TRS# 804627

(2) Contact Information

Contact Person: J.R. Wilson
Title: Executive Vice President
Company Name: Texas RSA 8 South Limited Partnership
Address: P.O. Box 1329
Stanton, TX 79782-1329
Phone Number: 915-756-3826
FAX Number: 915-756-2693
Email: jamesbobwilson@aol.com

E911 Phase II Location Technology Information

(1) Type of Technology

Texas RSA 8 South Limited Partnership believes that a network-based technology is the only option available as of the date of this filing. Most major handset manufacturers have notified the Commission that they will not produce location capable handsets in time to meet the Commission's requirements. Texas RSA 8 is unaware of any technology that has been proven in independent, scientifically valid trials to meet the Commission's requirements.

Texas RSA 8 South will likely utilize a combination of TDOA (Time Difference of Arrival) and AOA (Angle of Arrival) technology position determining equipment.

TDOA uses multiple receivers, located at cell sites, with highly accurate timing sources. It requires a minimum of three receivers to locate a caller. The mobile unit's signal is received at the cell sites and time stamped. The difference in the time received is used to calculate intersecting hyperbolic lines. The intersection of these lines is an estimation of the caller's location.

AOA utilizes an array of specialized antennas located at cell sites. The array determines the angle at which the mobile unit's signal arrives at each element of an array. The intersection of the angle at which the signal arrives at multiple cell sites is used to estimate the location of the caller.

Texas RSA 8 South will likely use the same technology throughout its service territory.

In addition to Position Determining Equipment (PDE), all technologies require a location management system to interface between the PDE and the mobile switching center and the wireline network E911 system. It is possible that the modifications to Texas RSA 8's mobile switching centers and network may be required as well. Texas RSA 8 is unaware of the nature of any such required modifications.

Texas RSA 8 has not chosen a vender or venders for either PDE or location management as of the date of this filing. Texas RSA 8 is unaware as to whether the wireline E911 network is capable of supporting Phase II E911 service in the area in which it has been requested. Information has been requested that the appropriate local exchange carrier as to the nature and extent of any modifications required and the schedule for their implementation.